

MEMO ENDORSED

## Law Office of Angus James Bell

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September 23, 2021

Hon. Nelson S. Roman, U.S.D.J  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-44150

**Re: United States v. Markel Overton, 17 Cr. 644 (NSR) -01**

Judge Roman,

I write to request an order seeking payment of an additional twenty eight and nine tenths (28.9) hours at the rate of \$90.00 for my associate counsel, Mr. Alain V. Massena. Your Honor's first order dated February 16, 2018 authorized an associate attorney for 100 hours at the rate of \$90.00 and Your Honor's subsequent order dated March 1, 2018 assigned Mr. Massena to Mr. Overton's case as associate counsel for an additional 100 hours at the rate of \$90.00 without prejudice to seek additional time if necessary.

Mr. Massena was an essential part of the representation of Mr. Overton during his death penalty case. Mr. Massena was called upon to review an extensive amount of discovery and research issues related to the Sentencing Guidelines. In the face of the COVID- 19 pandemic and Mr. Overton's request to substitute counsel, Mr. Massena's direct involvement with Mr. Overton and his family was necessary to protect Mr. Overton's health and ensure he made informed decisions about his representation.

I respectfully request that Mr. Massena be paid for the additional time that he worked on this matter.

Sincerely,

*A. James Bell*  
Angus James Bell, Esq.

Deft counsel's request for associate counsel Alain V. Massena to seek payment for an additional 28.9 hours at a rate of \$90/hr is GRANTED. Clerk of Court requested to terminate the motion (doc. 400).  
Dated: Sept. 28, 2021

**SO ORDERED:**

*[Signature]*  
HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE

USDC SDNY
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